

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

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|--------------------|---|--|
| IN RE: |) | BANKRUPTCY CASE NO.: 19-12703 |
| |) | |
| BETTYE TYUS |) | CHAPTER 13 PROCEEDING |
| |) | |
| |) | JUDGE JESSICA E. PRICE SMITH |
| DEBTOR |) | |
| |) | <u>MOTION TO DISMISS CASE</u> |
| |) | <u>PURSUANT TO 11 USC § 1307(b)</u> |

Now comes the Debtor, Bettye Tyus, by and through counsel, and, pursuant to 11 U.S.C. § 1307(b), respectfully requests that this Court issue an Order Dismissing her case. .

For cause Debtor states that she is unable to continue to fund a Chapter 13 Plan and seeks Dismissal.

WHEREFORE, Debtor prays this Motion is granted.

Respectfully Submitted,

AMOURGIS & ASSOCIATES, LLC

/s/ Charles W. Fonda _____
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Attorney for Debtor

CERTIFICATE OF SERVICE

I certify that on June 28, 2019 the foregoing document was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Charles W. Fonda on behalf of Debtor at charlesf@amourgis.com;

Lauren A. Helbling, on behalf of Chapter 13 Trustee's office at ch13trustee@ch13cleve.com,
lhelbling13@ecf.epiqsystems.com

Cleveland Office of the United States Trustee, on behalf of Daniel M. McDermott, United States Trustee, at the registered address of the US Trustee @ USDOJ.gov established with the bankruptcy court.

And by regular U.S. mail, postage prepaid, on:

Bettye J. Tyus
4175 East 147th St.
Cleveland, OH 44128

All Creditors Per Attached List.

/s/ Charles W. Fonda
Charles W. Fonda (0022753)
Attorney for Debtor

Amerassist A/R Solutions
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Andrew C Liu D.O PH.D
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Autauga County
Attn: Officer or Agent
Kathy Evans, Revenue Commissioner
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Prattville, AL 36067

Bank Of America
Attn: Bankruptcy
Po Box 982238
El Paso, TX 79998

Brinks Money
Po Box 149016
Austin, TX 78714

City of Cleveland
Division of Assessments & Licenses
601 Lakeside Ave. rm 320
Cleveland, OH 44114

Cleveland EMS
601 Lakeside Ave., Room 127
Cleveland, OH 44114

Cleveland Urology Associates, Inc.
P.O. Box 74008884
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Clinical Medical Services Company
P.O. Box 92237
Cleveland, OH 44193

Cuyahoga County Treasurer
ATTN: Officer or Agent
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Cleveland, OH 44115

Cuyahoga County Treasurer
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JP Recover Services, Inc.
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The Avenue Care and Rehabilitation
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The Lillian and Betty Ratner School
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